

July 7, 2005

Regulatory Analysis and Development  
PPD, APHIS Station 3C71  
4700 River Road Unit 118  
Riverdale, Maryland 20737-1238

RE: Comments referring to Docket Number 05-015-1 – National Animal Identification System; Notice of Availability of a Draft Strategic Plan and Draft Program Standards

Greetings:

My name is Taylor H. Woods, DVM, Assistant State Veterinarian, state of Missouri and a livestock producer.

- I. I support the overall objective of NAIS and the program standards in order for us to establish the following;
  - a. Establish standards for each state and properly identify locations that produce, manage and hold livestock.
  - b. Establish national standards to properly identify individual animals or group lot of animals that move into and through our marketing chain.
  - c. Establish a uniform national standard data management system to record the movement of individual animal or group of animals at change of ownership interstate movement, or commingling with other livestock and;
  - d. In the event of need, to be able to trace animals of concern from part of diagnosis through the marketing chain within 48 hours.

I support the standardization of animal or group lot tracking through premise identification and animal identification for disease purposes. I support the strategic plan calling for this information to be gathered and stored in a central database.

- II. Individual animal ID and technology neutral issue – I agree with the cattle working group that Radio Frequency Identification Device (RFID) ear tags is the method of choice at this time. Technology neutral will not work for the cattle industry if it means that all technology can be used because of the chaos it would produce in markets. In Missouri, we have 120 livestock markets, only one type of RFID's can be used or it will wreck our marketing system.
- III. Making NAIS mandatory by January, 2009 - I feel we could move the time of implementation of this program to January, 2007. I feel this is adequate time to develop the infrastructure for the market and to do the outreach for the producers.

The program must be mandatory to all states for it to work. Producers will have to have their cattle identified at home if at all possible, for this will do two things;

- a. Reduce the cost to producers.
- b. Will speed the process of moving cattle at the speed of commerce at this market.

I believe that all of Missouri's markets will be an AIN manager. Tagging sites will be allowed and recommended where needed. I also feel that tagging sites will be needed for the older and city farmers that do not have adequate working facilities at their farms. I firmly expect that markets in Missouri will tag as many cattle as possible to service their customers.

- IV. Reporting of private sales requirement - I believe when a private sale occurs that both parties should report the transaction. The final responsibility for this incident rest with the buyer. This would be best supported by a web based reporting system but for those folks, i.e. Amish and Mennonites, a paper trail could be used. In Missouri, twenty percent (20%) of our sales are private treaty so this is very important to us.
- V. When to Identify – In order for us to achieve a 48 hour trace back, we must identify at commerce, commingling or for interstate movement. For most producers, verifying date of birth is not possible, except to the year. I believe the basic requirements, if and when reached will provide us with the knowledge we need for 48 hour trace back.
- VI. Time lines for implement NAIS – I believe the timeline set by USDA is not aggressive enough. I believe the time line for implementation should be set January, 2007. Reasons for this;
  - a. Funding should be granted for this time line to be reached.
  - b. Food industry has passed the program as to the demands of Wal-Mart & McDonalds.
  - c. Industry is asking for a shorter time line.
- VII. Timelines for species ID implementation – I believe all species should be brought to the program as soon as possible. Given the relationship of foot and mouth disease to other animals, except horses, to identify just cattle, sheep and goats would only be part of the puzzle. In the avian industry, avian influenzas keep coming to the forefront. So, all species should be identified ASAP.
- VIII. Cost effective and efficient methods for submitting data. Electronic transfer is the method of choice. The amount of information that has to be moved will encourage producers, markets, abattoirs, breed association and third party date manager to use this method. Paper trails are much slower and much more costly to record.
- IX. Confidentiality of Data – All information concerning NAIS should be protected from disclosure. The only reason for the NAIS program is to enhance disease surveillance and monitoring system. The animal tracking component promises to provide animal health authorities the opportunity to significantly improve plans to prevent and control disease outbreaks. Missouri has passed legislation to protect premise information under FOIA.
- X. I support the general concept that the receiving premises are the entity ultimately responsible for reporting movement. The database supporting the reporting of

animal movement should be electronically based and centralized in structure. The reporting of animal movement information, premise of origin, premise of destination, animal identification, and date transactions/movement should be state controlled and coordinated through the proposed NAIS animal tracking system. Such a system will provide large and small producers an easy step, cost effective choice is meeting the requirements of the NAIS. In order for a state veterinarian to react to a FAD incursion, a central data system must be available to be able to bring up all records of movement of the animal in question.

XI. How should a private database be funded? I can only see that a private database be funded by the people that use it. As a state using it, I would have to pay like anyone else and no one as yet said what it would cost. I support and believe that a government controlled NAIS database for recording animal movement in and out of state would be the fairest and least costly to all our producers.

XII. Multiple databases – I believe that if we don't have a centralized database for all species, then each species must have a link to a centralized access point. This would be needed for state/federal veterinarians to respond quickly to a disease outbreak. Also, this would be needed for livestock markets to send their information at the end of sale.

Thank you for the opportunity to submit these comments and to participate in this process.

Sincerely,

Division of Animal Health

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Assistant State Veterinarian